

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

JEANICE FARLEY, Individually and on Behalf of )	
MICHAEL FARLEY, an Incompetent Adult; )	
GEORGE FARLEY; JAMES FARLEY and )	
KIMBERLY-RAE FARLEY, )	
)	
Plaintiffs, )	
)	
v. )	Civil No. 13-cv-261-PB
)	
UNITED STATES OF AMERICA, )	
)	
Defendant. )	
_____ )	

JOINT MOTION TO EXTEND DEADLINE  
FOR THE PARTIES' DISCLOSURE OF EXPERTS

Pursuant to Rule 7.2 of the Local Rules for the United States District Court for the District of New Hampshire, the parties request the Court extend the deadlines for each parties' disclosure of experts. In support of this motion, the parties state as follows:

1. Currently, Plaintiffs are due to disclose their experts on April 4, 2014, with Defendant's disclosures due on June 3, 2014. Endorsed Order on DN 9.
2. Plaintiffs' counsel has recently deposed several key fact witnesses. Defendant is scheduled to take the deposition of Jeanice Farley on April 16, 2014. In order to allow sufficient time to receive and forward the deposition transcripts to potential expert witnesses, the parties require an additional month in which to disclosure their expert reports.
3. Plaintiff expects to be able to disclose their experts on May 5, 2014. Defendant will require a commensurate extension to, and including, July 7, 2014.

4. Granting of this motion with not result in the continuance of any hearing, conference or trial in this matter.

5. Due to the nature of this motion, no supporting memorandum of law is required.

Therefore, the parties request that this Court extend the deadlines for disclosure of Plaintiffs' expert witnesses to May 5, 2014 and Defendant's expert witnesses to July 7, 2014.

Respectfully submitted,

Plaintiffs Michael Farley, Jeanice Farley,  
George Farley, James Farley and  
Kimberly-Rae Farley,

JOHN P. KACAVAS  
United States Attorney

/s/ Jamal K. Alsaffar

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/s/ T. David Plourde

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Dated: April 1, 2014

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CERTIFICATE OF SERVICE

I certify that on this 1st day of April, 2014, a copy of the above motion was served via the ECF system on David Plourde.

/s/ Jamal K. Alsaffar

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Jamal K. Alsaffar